LINCOLN OFFICE SUITE 500 301 SOUTH 13TH STREET LINCOLN, NEBRASKA 68508-2578 TELEPHONE 402-437-8500 FAX 402-437-8558 Woods & Aitken

DENVER OFFICE SUITE 525 8055 EAST TUFTS AVENUE DENVER, COLORADO 80237-2835 TELEPHONE 303-606-6700 FAX 303-606-6701

OMAHA OFFICE SUITE 525 10250 REGENCY CIRCLE OMAHA, NEBRASKA 68114-3754 TELEPHONE 402-898-7400 FAX 402-898-7401 THOMAS J. MOORMAN
DIRECT: (202) 944-9502
EMAIL: TMOORMAN@WOODSAITKEN.COM
WWW.WOODSAITKEN.COM
ADMITTED TO PRACTICE ONLY IN THE DISTRICT OF COLUMBIA

WASHINGTON OFFICE SUITE 310 5151 WISCONSIN AVENUE, N.W. WASHINGTON, D.C. 20016-4124 TELEPHONE 202-944-9500 FAX 202-944-9501

PLEASE RESPOND TO WASHINGTON ADDRESS

June 29, 2017

REDACTED - FOR PUBLIC INSPECTION

VIA ECFS

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re:

WC Docket No. 14-58

Submission of Redacted Version of FCC Form 481 for Armstrong Telephone Company -- Pennsylvania (Study Area Code 170189)

Dear Ms. Dortch:

Attached for electronic filing is a copy of the redacted public version of the FCC Form 481 of Armstrong Telephone Company -- Pennsylvania (the "Company") which contains the Company's financial information required by Section 54.313(f)(2) of the Commission's Rules (which is filed in compliance with the Protective Order referenced below).

The Company's FCC Form 481 has been electronically filed with the Universal Service Administrative Company. Consistent with the Commission's Protective Order, WC Docket No. 10-90 et al., DA 16-296, released March 22, 2016 (the "Protective Order"), the Company, under separate letter and pursuant to the requirements of the Protective Order, has submitted the confidential version of the Company's FCC Form 481 which contains the Company's financial information required by Section 54.313(f)(2) of the Commission's Rules.

Please direct any questions concerning this matter to the undersigned.

Respectfully submitted,

Thomas J. Moorman

Counsel to Armstrong Telephone Company -- Pennsylvania

Attachment

	REDACTED - FO	OR PUBLIC INSPECTION FCC Form 481
FCC For	m 481 - Carrier Annual Reporting Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	170189
<015>	Study Area Name	ARMSTRONG TEL CO-PA
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Carrie Curtis
<035>	Contact Telephone Number: Number of the person identified in data line <030>	7242830925 ext.50380
<039>	Contact Email Address: Email of the person identified in data line <030>	ccurtis@agoc.com
	Form Type	54.313 and 54.422

Page 2

							<u>\</u>	Preventative Procedures											
		and the state of t					Ş	Service Outage Resolution											
July 2013							\$	Did This Outage Affect Multiple Study Areas (Yes / No)											
Ainr							\e\	Service Outage Description (Check all that apply)			-								
							÷	911 Facilities Affected (Yes / No)											
	CO-PA		6	xt.50380	com	No	<c2></c2>	Total Number of Customers		3									
170189	ARMSTRONG TEL CO-PA	2018	Carrie Curtis)> ccurtis@agoc.com	e outages?	<c1></c1>	Number of Customers Affected											
			data	Contact Telephone Number - Number of person identified in data line <030>	Contact Email Address - Email Address of person identified in data line <030>	For the prior calendar year, were there any reportable voice service outages?	<p4></p4>	Outage End Time											
			Contact Name - Person USAC should contact regarding this data	rson identified	erson identified	any reportab	<	Outage End Date											
			should contact	Number of pe	il Address of pe	ır, were there	<	Outage Start Outage Start Date Time											
qe	me		- Person USAC	hone Number -	Address - Emai	· calendar yea	4	Outage Start Date											
Study Area Code	Study Area Name	Program Year	Contact Name	Contact Telepi	Contact Email	For the prior	< 8 >	NORS Reference Number											
<010>	<015>	<020>	<030>	<032>	<039>	<210>	<220>												

Page 3

(300) Unfulfilled Service Request Data Collection Form	FCC Form 481 OMB Control No: 3060-0986/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	170189
<015> Study Area Name	ARMSTRONG TEL CO-PA
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Carrie Curtis
<035> Contact Telephone Number - Number of person identified in data line <030>	7242830925 ext.50380
<039> Contact Email Address - Email Address of person identified in data line <030>	ccurtis@agoc.com
<300> Unfulfilled service request (voice)	0
<310> Detail on attempts (voice)	
Name	Name of Attached Document
<320> Unfulfilled service request (broadband)	0
Soor Detail on attempts (proadband)	Name of Attached Document

(400) Numbe Data Collecti	r of Complaints per 1,000 customers. on Form				FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	170189			
<015>	Study Area Name	ARHSTRONG TEL CO-PA			
<020>	Program Year	2018			
<030>	Contact Name - Person USAC sh	ould contact regarding this data	Carrie Cur	tis	
<035>	Contact Telephone Number - No <030>	ımber of person identified in dat		830925 ext.50380	
<039>	Contact Email Address - Email A <030>	ddress of person identified in da	ita line 🖽	urtis@agoc.com	
<400>	Select from the drop-down list to voice complaints (zero or greate: calendar year for each service ar any facilities you own, operate, I	r) for voice telephony service in t ea in which you are designated a	the prior	Offered only	fixed voice
<410>	Complaints per 1000 customers	for fixed voice	0.	. 0	
<420>	Complaints per 1000 customers	for mobile voice			
<430>	Select from the drop-down list to end-user customer complaints (a the prior calendar year for each an ETC for any facilities you own	ero or greater) for broadband se service area in which you are de:	ervice in o	Offered only	fixed broadband
<440>	Complaints per 1000 customers	for fixed broadband	0.	0	

<450> Complaints per 1000 customers for mobile broadband

<010>	Study Area Code	170189
<015>	Study Area Name	ARMSTRONG TEL CO-PA
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Carrie Curtis
<035>	Contact Telephone Number - Number of person identified in data line <030	7242830925 ext.50380
<039>	Contact Email Address - Email Address of person identified in data line < 030	> ccurtis@agoc.com
<500>	Certify compliance with applicable service quality standards and consumer	protection rules Yes
	·····	170189pa510.pdf

* *	unctionality in Emergency Situations ollection Form	FCC Form 481 OMB Control No. 3050-0986/OM8 Control No. 3060-0819 July 2013
<010>	Study Area Code	170189
<015>	Study Area Name	ARMSTRONG TEL CO-PA
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Carrie Curtis
<035>	Contact Telephone Number - Number of person identified in data line <030>	7242830925 ext.50380
<039>	Contact Email Address - Email Address of person identified in data line <030>	ccurtia@agoc.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	170189pa610.pdf

Study Area Code 170189 1	State Universal Service Fee Service Charge	Total per line Rates and Fees
Ct regarding this data		Total per line Rates and Fees
ct regarding this data carrie curtis erson identified in data line <030> 7242830925 ext.50380		Total per line Rates and Fees
ct regarding this data		Total per line Rates and Fees
erson identified in data line <030> 7242830925 ext.50380 Person identified in data line <030> court.1seagoc.com 1/1/2017 Cb1> cb2> cb2> cb3> Residential Local State Subscriber Line Charge Service Rate See attached worksheet		Total per line Rates and Fees
Sidential Local Service Charge Effective Date 1/1/2017		Total per line Rates and Fees
sidential Local Service Charge (gle State-wide Residential Local Service Charge		Total per line Rates and Fees
Exchange (ILEC) SAC (CETC) Rate Type Service Rate State Subscriber Line Charge Service Rate State Subscriber Line Charge See attached worksheet		Total per line Rates and Fees
Exchange (ILEC) SAC (CETC) Rate Type Service Rate State Subscriber Line Charge		Total per line Rates and Fee
See attached worksheet		_
See attached worksheet		

ô	<010> Study Area Code	170189
3	<015> Study Area Name	ARMSTRONG TEL CO-PA
6	<020> Program Year	2018
۵	<030> Contact Name - Person USAC should contact regarding this data	Carrie Curtis
25	<035> Contact Telephone Number - Number of person identified in data line <030>	1
\$6	<039> Contact Email Address - Email Address of person identified in data line <030>	ine <030> ccurtis@agoc.com

Usage Allowance nce Action Taken When Limit Reached {select }											
Usage Allowance (GB)											
Broadband Service - Download Speed Broadband Service - (Mbps) Upload Speed (Mbps) (GB) Limit Reached (s								,			
Broadband Service - Download Speed (Mbps)											
Total Rate and Fees			-	bed	5						
State Regulated Fees				See attached	Worksheet	100101					
Residential Rate											
Exchange (ILEC)											
State											

ABBYSTHEONG TEL CO-PA	See attached worksheet	Doing Business As Company or Brand Designation

Page 10

(900) Tri	(900) Tribal Lands Reporting		FCC Form 481
	iletiui piiii		UMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
\$010	Study Area Code	170189	
<015>	1	ARMSTRONG TEL CO-PA	CO-PA
<020>		2018	
<030>	Contact Name - Person USAC should contact regarding this data	Carrie Curtis	
<032>		7242830925 ext.50380	.50380
<039>	1 1	ccurtis@agoc.com	no
<006>	Does the filing entity offer tribal land services? (Y/N)		No
<910>	Tribal Land(s) on which ETC Serves		
<920>	Tribal Government Engagement Obligation		
			Name of Attached Document
If your (if your company serves Tribal lands, please select (Yes,No, NA) for each these boxes		
to conf	to confirm the status described on the attached PDF, on line 920,	Select	
\$ 54.31	demonstrates coordination with the Hibal government pursuant to § 54.313(a)(9) includes:	Yes or No or Not Applicable	
<921>	Needs assessment and deployment planning with a focus on Tribal		
<925>	community anchor institutions. Feasibility and sustainability planning:		
<923>	Marketing services in a culturally sensitive manner;		
<924>	Compliance with Rights of way processes		
<925>	Compliance with Land Use permitting requirements		
<976>	Compliance with Facilities Siting rules		
<927>	Compliance with Environmental Review processes		
<928>	Compliance with Cultural Preservation review processes		
<929>	Compliance with Tribal Business and Licensing requirements.		

Page 11

(1000) V Data Col	(1000) Voice and Broadband Service Rate Comparability Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July, 2013
<010>	Study Area Code	מפוערו
<015>	Study Area Name	ARMSTRONG TEL CO-PA
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Carrie Curtis
<035>	Contact Telephone Number - Number of person identified in data line <030>	7242830925 ext.50380
<039>	Contact Email Address - Email Address of person identified in data line <030>	ccurtis@agoc.com
<1000>	Voice services rate comparability certification	, in the second
<1010>	Attach detailed description for voice services rate comparability compliance	170189pa1010.pdf
		Name of Attached Document
<1020>	Broadband comparability certification	Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau
<1030>	Attach detailed description for broadband comparability compliance	170189pa1030.pdf
		Name of Attached Document

(1100) N Data Col	(1100) No Terrestrial Backhaul Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	170189
<015>	Study Area Name	ARMSTRONG TEL CO-PA
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Carrie Curtis
<032>		7242830925 ext.50380
<039>	Contact Email Address - Email Address of person identified in data line <030>	ccurtis@agoc.com
<1100>	Certify whether terrestrial backhaul options exist (Y/N)	Yes
<1130>	Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).	Kbps

FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	170169	ARMSTRONG TEL CO-PA	Carrie Curtis	7242830925 ext.50380	ccurtis@agoc.com.	170189pa1210.pdf		Name of Attached Document	agoc.com				
(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	<010> Study Area Code <015> Study Area Name	1	<030> Contact Name - Person USAC should contact regarding this data	Contact Telephone Number - Number of person identified in data line <030>	<039> Contact Email Address - Email Address of person identified in data line <030>	7.00	<1210> Terms & Conditions of Voice Telephony Lifeline Plans		<1220> Link to Public Website HTTP agoc	"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:	<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<1222> Details on the number of minutes provided as part of the plan,	<12233 Additional charges for tall calle and rates for each cush also

FCC Form 481. OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	170169	ARMSTRONG TEL CO-PA	2018		n identified in data line <030> 7242830925 ext - 50380	n identified in data line <030> courtis@agoc.com
(2005) Price Cap Carrier Additional Documentation Data Collection Form Including Rate-of-Return Carriers offiliated with Price Cap Local Exchange Carriers	<010> Study Area Code	<015> Study Area Name	<020> Program Year	<030> Contact Name - Person USAC should contact regarding this data		<039> Contact Email Address - Email Address of person identified in data line <03
(2005) I Data Co Includin	<010>	<015>	<020>	<030>	<032>	<039>

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

				Document Listing ion	Document Listing	
				Name of Attached Document Listing Required Information	Name of Attached Document Listing Required Information	
3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.	Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbns/1Mbns - 54.313(b)(2)(i) Round 2 recipients only	The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.		Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only. Round 2 Recipient of Incremental Support?	Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).	2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)
<2011>	<2022>	<2023>	<2024A>	<2024B>	<2025B>	<2015>

FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	(p)}		used for	nor s to Name of Attached Document Listing (1)(ii)(A) Required Information	tions and ings seeking e schools and is and carrier is tere at rates and libraries in
2005) Price Cap Carrier Additional Documentation ata Collection Form ncluding Rate-of-Return Carriers offiliated with Price Cap Local Exchange Carriers	Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)} (2016> Certification support used to build broadband Connect America Phase II Reporting {47 CFR § 54.313(e)}	<2017A> Connect America Fund Phase II recipient?	<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.	Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)	Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)
2005) Price Cap Carri Jata Collection Form Acluding Rate-of-Retu	Price Ca <2016> Connect	<2017A>	<2017C>	<2018>	<2019>

	REDACTED	- FOR PU	BLIC IN	SPECIIO	N	Page 16
(3005) Rate Data Collect	Of Return Carrier Additional Documentation Ion Form				FCC Form 481 OMB Control No. 3050-0985/OMB C July 2013	ontrol No. 3060-0819
<010>	Study Area Code		170189			
<015>	Study Area Name			ONG TEL (
<020>	Program Year		2018	ONO TEE C		
<030>	Contact Name - Person USAC should contact regarding this of	lata	Carrie	Curtis		
<035>	Contact Telephone Number - Number of person identified in	data line <030>		925 ext.5	0380	
				s@agoc.co		
<039>	Contact Email Address - Email Address of person identified in	n data line <030>		3		
Markadalah 1200						1
financial r	n the drop down menu or check the boxes below to eporting requirements set forth in 47 CFR 54.313(f)(pelow is accurate.					
(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)					
(3010A)	Certification of Public Interest Obligations {47 CFR §		Yes - A	ttach Certific		. *
	54.313(f)(1)(i)}				170189pa3010.pdf	
(3010B)	Please Provide Attachment	Name of Attach Information	ned Document L	isting Required		
(3012A)		No - No New Cor	nmunity Anchor	rs		
(3012B)	54.313(f)(1)(ii)} Please Provide Attachment		ned Document L	isting Required	•	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR	Information (Yes/No)	\odot	0		
(3014)	§ 54.313(f)(2)) If yes, does your company file the RUS annual report	(Yes/No)	0	\odot		
(3015)	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires: Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		[
3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	N. Can I				
3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Information		isting Required		
3018)	If the response is no on line 3014, is your company audited? If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:	(Yes/N	40)			
3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers					
3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows			✓		
3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line			1		
3022)	3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers					
3023)	Underlying information subjected to a review by an independent certified public accountant					
3024)	Underlying information subjected to an officer certification.					
3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows				170189pa3026 (Confidential)	.pdf
3026)	Attach the worksheet listing required information	Name of Attach	ed Document Li	isting Required		

Information

FCC Form 481. OMB Control No. 3060-0386/OMB Control No. 3060-0819 (3005) Rate Of Return Carrier Additional Documentation (Continued) Data Collection Form

uly 2013							
	170189	ARMSTRONG TEL CO-PA	2018	Carrie Curtis	7242830925 ext.50380	ccurtis@agoc.com	
	<010> Study Area Code	<015> Study Area Name	<020> Program Year	<030> Contact Name - Person USAC should contact regarding this data	<035> Contact Telephone Number - Number of person identified in data line <030> 7242830925 ext. 50380	<039> Contact Email Address - Email Address of person identified in data line <030> ccurt is@aqoc . com	
	<010>	<015>	<020>	<030>	<035>	<039>	

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

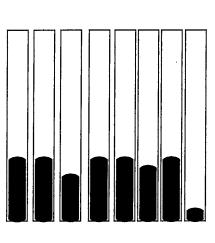
(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



[4005] Rural Broadband Experiment Additional Documentation FCC Form 481
Data Collection Form OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	170189
<015>	Study Area Name	ARMSTRONG TEL CO-PA
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Carrie Curtis
<035>	Contact Telephone Number - Number of person identified in data li	ne <030> 7242830925 ext.50380
<039>	Contact Email Address - Email Address of person identified in data li	ne <030> ccurtis@agoc.com

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions - FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

relevant geographic area.

of community anchor institutions to which the recipient newly began providing access to	Name of Attached Document Listing Required Information	
broadband service in the preceding calendar year.		
Broadband Deployment Locations – FCC 14-98 (par	agraph 80)	
4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	
4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the	Name of Attached Document Listing Required Information	

Data Col	tion - Reporting Carrier lection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	170189
<015>	5tudy Area Name	ARMSTRONG TEL CO-PA
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Carrie Curtis
<035>	Contact Telephone Number - Number of person identified in data line <030>	7242830925 ext.50380
<039>	Contact Email Address - Email Address of person identified in data line <030>	ccurtis@agoc.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

l certify that I am an officer of the reporting carrier; my responsibilitie recipients; and, to the best of my knowledge, the information reporte	es include ensuring the accuracy of the annual reporting requirements for universal s ed on this form and in any attachments is accurate.	ervice support
Name of Reporting Carrier: ARMSTRONG TEL CO-PA		
Signature of Authorized Officer: CERTIFIED ONLINE	Date ⁰	06/26/2017
Printed name of Authorized Officer: Mark Rankin		
Title or position of Authorized Officer: VP Financial Reporting		
Telephone number of Authorized Officer: 7242830925 ext.50243		
Study Area Code of Reporting Carrier: 170189	Filing Due Date for this form: 07/03/2017	

Data Col	tion - Agent / Carrier lection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0919 July 2013
<010>	Study Area Code	170189
<015>	Study Area Name	ARMSTRONG TEL CO-PA
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Carrie Curtis
<035>	Contact Telephone Number - Number of person identified in data line <030>	7242830925 ext.50380
<039>	Contact Email Address - Email Address of person identified in data line <030>	ccurtis@agoc.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

I certify that (Name of Agent)	is authorized to submit the information reported on behalf of the reporting carrier. 1
also certify that I am an officer of the reporting carrier; m agent; and, to the best of my knowledge, the reports and	ponsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized provided to the authorized agent is accurate.
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agen	t Authorized to File Annual Reports for CAF or LI Reci	pients on Behalf of Reporting Carrier
	thorized to submit the annual reports for universal service supp e reporting carrier; and, to the best of my knowledge, the inforr	
Name of Reporting Carrier:		
Name of Authorized Agent Firm:		
Signature of Authorized Agent or Employee of Agent:		Date:
Name of Authorized Agent Employee:		
Title or position of Authorized Agent or Employee of Age	nt	
Telephone number of Authorized Agent or Employee of A	Agent:	4
Study Area Code of Reporting Carrier:	Filing Due Date for this form:	

Attachments

(700) Pric Data Coll	(700) Price Offerings Data Collection Form	(700) Price Offerings including Voice Rate Data Data Collection Form	Sata				7. (C)	FCC Form 481 O/MB Control No. 3060-0986/O/MB Control No. 3060-0819	Control No. 3060-0819
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Response Line 510 Armstrong Telephone Company – Pennsylvania Study Area 170189

§54.313(a)(5) - COMPLIANCE WITH SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION

Voice Network

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) Armstrong Telephone Company – Pennsylvania ("Armstrong") is in compliance with appropriate FCC Service Quality Standards and Consumer Protection Rules. Armstrong provides CPNI training to all of its new employees and in addition trains all of its existing employees on an annual basis. Armstrong also conducts subscriber outreach regarding CPNI by placing CPNI explanation onto its website at www.agoc.com which informs subscribers about CPNI rules and other applicable customer rights and obligations. In addition Armstrong trains staff on Red Flag issues on an annual basis. All company employees are required to sign and acknowledge that they have completed CPNI and Red Flag training and understand obligations to adherence of applicable rules.

Armstrong also outlines its rates, terms, and conditions under which Armstrong offers service in its Local Exchange Tariff. The tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. Armstrong keeps its tariffs available for public inspection at its business offices.

Broadband Network

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) Armstrong is in compliance with applicable FCC Service Quality Standards and Consumer Protection Rules. Armstrong trains staff on applicable rules for broadband services issues on an annual basis. In addition Armstrong has placed on its website at www.agoc.com its network practices and policies regarding FCC's Net Neutrality Rules.

Armstrong also outlines its rates, terms, and conditions under which Armstrong offers Broadband service in National Exchange Carrier Association, Inc. ("NECA") Tariff #5 to Internet Service Providers ("ISPs" or an "ISP"). The Tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. Public inspection of NECA Tariff #5 can be found on NECA's website. Retail DSL rates, terms, and conditions for retail services are provided by the ISP.

Response Line 610 Armstrong Telephone Company – Pennsylvania Study Area 170189

§54.313(a)(6) – ABILITY TO FUNCTION IN EMERGENCY SITUATIONS

Voice Network

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2)Armstrong Telephone Company — Pennsylvania ("Armstrong") meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to Armstrong's central office by use of a generator and batteries that provide to provide emergency power. Armstrong has also sufficient spare cards for its fiber optic network to provide almost instantaneous replacement should there ever be a card failure in the core network. Armstrong also has proper staff in place to repair any fiber cuts in a timely manner. Armstrong has connectivity with neighboring telephone exchanges as well as the LATA tandem to provide diverse options to reroute traffic should an emergency arise. Armstrong has developed and trained its staff on network preparedness plans in case of emergency situations. Armstrong is prepared and capable of managing traffic spikes resulting from emergency situations and has sufficient switching capabilities to handle such situations.

Broadband Network

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) Armstrong Telephone Company – Pennsylvania ("Armstrong") meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to Armstrong central offices by use of a generator and batteries that provide it with 8 to 12 hours of emergency power that is also used to provide service to the broadband network. In addition, Armstrong field electronics have 8 to 12 hours of back-up power by use of generators and batteries. Armstrong has also sufficient spare cards for its fiber optic network to provide almost instantaneous replacement should there ever be a card failure in the core network. Armstrong also has proper staff in place to repair any fiber cuts in a timely manner. Armstrong has connectivity with neighboring telephone exchanges as well as the LATA tandem to provide diverse options to reroute traffic should an emergency arise. Armstrong has developed and trained its staff on network preparedness plans in case of emergency situations.

Response to Line 1010 Armstrong Telephone Company – Pennsylvania Study Area 170189

Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10) Armstrong Telephone Company – Pennsylvania (the "Company") is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$49.51 as specified in Public Notice DA 17-167 issued on February 14, 2017. The Company's current total local end-user rate¹ of \$13.50 (which includes a local fee of \$13.50, mandated state fees of 0.00 and mandatory extended area service charges of \$0.00) is not above the standard deviation as specified in the USF/ICC Transformation Order. ²

¹ Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

² USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) "The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average."

Response to Line 1030 Armstrong Telephone Company – Pennsylvania Study Area 170189

§54.313(a)(11) - BROADBAND SERVICES COMPARABILITY REPORT

Pursuant to 47 C.F.R. § 54.313 (a) (11) Armstrong Telephone Company – Pennsylvania charges a residential rate of \$44.95 for broadband providing 10 Mbps download, 1 Mbps upload, and an unlimited usage allowance. This rate is lower than \$77.98, which is the 2017 reasonable comparability benchmark for the same offering established by the Wireline Competition Bureau.¹

¹ Wireline Competition Bureau Announces Results of 2016Urban Rate Survey for Fixed Voice and Broadband Services and Posting of Survey Data and Explanatory Notes, Public Notice, WC Docket No. 10-90, DA 17-167 (rel. February 14, 2017).

Supplement No. 85 - Telephone - PA P.U.C. No. 10

Armstrong Telephone Company-Pennsylvania Section 3 Second Revised Sheet 10 Cancels First Revised Sheet 10

LIFELINE SERVICE

A. DESCRIPTION

Lifeline Service is a Residence offering for low-income customers who qualify for this service in accordance with the following Regulations. NOTE: Customers who qualify for Lifeline Service may also qualify for Link Up America Service.

B. REGULATIONS

- 1. Lifeline Service is available to qualified residence customers and is provided via a residence individual Dial Tone Line. Lifeline Service is limited to only one Service per qualified customer or household. A potential Lifeline customer who has an outstanding final bill for telephone service which is less than (4) years old must pay the entire balance of any Basic Service final bill before being eligible for Lifeline Service.
- 2. Residence Lifeline Service consists of the following tariffed standard features and optional customer elected services at the applicable rates, charges and regulations for each feature and service provided:
 - a. One-Party Residence Unlimited Service and Local Measured Service, if available.
 - b. Directory Listing (standard only).
 - c. Non-Published or Non-Listed Telephone Number Service.
 - d. Access to Directory Assistance Service.
 - e. Touch Tone Calling Service.
 - f. Access to Message Toll Telephone Service and Optional Dial Station-To-Station Calling Plan Services. However, the Residence Lifeline Dial Tone Line will be blocked from dial station access to 976/556/900 and any other type of Audiotex Service.
 - g. Access to Operator Services.
 - h. Voluntary Toll Restriction Option.
 - i. Link Up America (if eligible).
 - i. Access to 800/888 Services.
 - k. Access to Call Trace.
 - 1. Access to Alerting and Reporting Systems (9-1-1 dialing).
 - m. Access to the Pennsylvania Telecommunications Relay Service.
 - n. Caller ID Per-call and Per-line Blocking
 - o. Other eligible telecommunications services at tariffed rates.

(C) (C)

(C) Indicates Change

Issued: March 16, 2005 Effective: March 17, 2005

Supplement No. 89 - Telephone - PA P.U.C. No. 10

Armstrong Telephone Company-Pennsylvania Section 3 Second Revised Sheet 11 Cancels First Revised Sheet 11

LIFELINE SERVICE

B. REGULATIONS (cont.)

3. An applicant for Lifeline Service must be a current participant in one of the following Pennsylvania programs, or be able to provide proof of household income which is at or below 135% of the annual Federal Poverty Guidelines for all States (except Alaska and Hawaii) and the District of Columbia. Recertification of a representative sample of Lifeline Service participants will be conducted annually by Armstrong Telephone Company-PA.

(C)

Pennsylvania Department of Public Welfare Link Up America Service Programs:

- * Temporary Assistance for Needy Families (TANF)
- * General Assistance (GA)
- * Supplemental Security Income (SSI)
- * Medicaid
- * Food Stamps
- * Low Income Home Energy Assistance Program (LIHEAP)

Additional Eligible Programs (Federal)(C)

- * Federal Public Housing
- * National School Free Lunch Program(C)

The DPW Programs listed above must be certified by DPW. Such certification by DPW will be provided only when a DPW client requests Lifeline Service based on the client's status as a participant in any of the above eligibility programs. Certification by DPW will be limited to confirmation of the client's program status (i.e., participation or non-participation). Participation by DPW is subject to execution of an agreement with DPW and Armstrong Telephone Company - Pennsylvania.

4. Lifeline Service will be provided to a customer only so long as such customer continues to meet the participation and certification guidelines in 2 (c) above. At the time of initial establishment of Lifeline Service, the customer agrees to have his or her eligibility recertified as determined by Armstrong Telephone Company - Pennsylvania. When the Company is notified by the customer or determines through recertification that the Lifeline Service customer is no longer a participant in the DPW programs in 2 (c) above or otherwise lowincome eligible, the customer will be notified (by telephone or letter) that the Lifeline Service rate is no longer applicable. Within the stated customer notification period (10 working days from the date of the notification), the customer can contact the Company to negotiate new Dial Tone Service arrangements at applicable tariff rates (no connection charges will apply for existing services or options retained). If the customer does not contact the Company by the end of the notification period, the Lifeline Service will be changed to applicable Exchange Area Dial Tone Line service at existing tariff rates (no connection charges will apply to existing services or options retained). Upon contacting the Company, the customer will have ten (10) working days to complete the low-income certification or recertification process in order to retain Lifeline Service.

(C) Indicates Change

Issued: September 9, 2005 Effective: September 20, 2005

Supplement No. 85 - Telephone - PA P.U.C. No. 10

Armstrong Telephone Company-Pennsylvania Section 3 First Revised Sheet 12 Cancels Original Sheet 12

LIFELINE SERVICE

B. REGULATIONS (cont'd)

- 5. A Lifeline Service customer may not subscribe to any other type of residence Local Exchange Service at the same or other premises. Lifeline Service will not be provided via Foreign Exchange or Foreign Central Office Service arrangements.
- 6. Only services listed in B (2) above will be provided to Lifeline customers. (C)
- 7. Lifeline Service customers are required to apply for the Link Up America benefit when applicable.
- 8. Customer requested temporary suspension of Lifeline Service is not permitted.
- 9. Lifeline Service does not apply to applicants who are full time students living in university or college controlled housing.
- 10. The applicant must not be a dependent for Federal Income Tax purposes, unless he or she is 60 years of age or older.
- 11. Lifeline customers are subject to all Residence service regulations in this and other tariffs of Armstrong Telephone Company-Pennsylvania.
- 12. Residence Lifeline Service cannot be resold by the Lifeline customer or the Lifeline customer's agent(s).
- 13. Resale of Lifeline Services are subject to wholesale rate obligations under Section 251 (c)(4) of the Telecommunications Act of 1996.
- 14. All outstanding charges, account balances and service restrictions apply to existing customers who qualify for Lifeline Service. Service restrictions will remain until the arrearage(s) have been paid in full.
- 15. Any Lifeline customer who has a past due balance of Toll Charges will be treated with the appropriate Chapter 64 regulations. The Residence Toll Restoral Charge applies to Lifeline Customers who are suspended for non-payment and who subsequently pay their outstanding toll charges and request toll restoral. If a Lifeline customer is toll restricted for a second occurrence the Company may, at its discretion, place the Lifeline customer on permanent toll restriction.
- 16. Toll-Blocking and Toll-Control services will be provided at no charge to Lifeline Service subscribers, to the extent that they are offered.

(C) Indicates Change
Issued: March 16, 2005
Effective: March 17, 2005

Supplement No. 101 - Telephone - PA P.U.C. No. 2

Armstrong Telephone Company-North Section 3
Second Revised Sheet 8
Cancels First Revised Sheet 8

LIFELINE SERVICE

C. LIFELINE SERVICE DIAL TONE LINE MONTHLY RATE

- 1. Applicable Residence Dial Tone monthly rate minus \$1.75 (1)
- 2. Lifeline Service customers will be billed the applicable Subscriber Line Charge monthly rate and will be given credit for the same amount of the Subscriber Line Charge as prescribed by the Federal Communications Commission at Docket Nos. 00-256, 96-45, 98-77, 98-166, and 00-193.
- 3. Lifeline Service is subject to all applicable state, local and federal taxes, and Surcharges, and to all applicable tariff rates, charges, surcharges and regulations

NOTE:

(1) The Dial Tone Line and Subscriber Line Charge monthly rate discounts will be reduced to the extent that application of the full discount would not result in rates that are less than zero.

(C)

(C) Indicates Change

Issued: December 31, 2001 Effective: January 1, 2002

OMB Approval 3060-0819

Annual Lifeline Eligible Telecommunications Carrier Certification Form

All carriers must complete all or portions of all sections Form must be submitted to USAC and filed with the Federal Communications Commission

IMPORTANT: PLEASE READ INSTRUCTIONS FIRST Deadline: January 31st (Annually)

170189		143001382
Study Area Code (SAC (An Eligible Telecommunication)		Service Provider Identification Number (SPIN) ertification form for each SAC through which it provides Lifeline service).
2016	PA	Armstrong Telephone Company - PA
Recertification Year	State	ETC Name
N/A		ARMSTRONG HOLDINGS INC
DBA, Marketing, or Ot (If same as ETC name, list "No	her Branding Name /A" Do <u>not</u> leave blank)	Holding Company Name (If same as ETC name, list "N/A" Do not leave blank)
Does the reporting comp	any have affiliated ETCs?	Yes 👩 No 🔘
owns or controls, is owned or co C.F.R. § 76.1200.	ontrolled by, or is under common ow	Act. That Section defines "affiliate" as "a person that (directly or indirectly) in ership or control with, another person." 47 U.S.C. § 153(2). See also 47
Affiliated ETC's SAC		Affiliated ETC's Name
See attached worksheet -	<u>-</u>	
formation, or other similar laws (or partnership agreen	legal document. An officer is nent), and would typically be p	of a position listed in the article of incorporation, articles of a person who occupies a position specified in the corporate by- president, vice president for operations, vice president for finance, er is a sole proprietorship, the owner must sign the certification.
Section 1: Initial Cer	tification All ETCs must complete	this section
I certify that the company li	sted above has certification pro	ocedures in place to:
that, to the best of my	knowledge, the company wa	ntation prior to enrolling a consumer in the Lifeline program, and as presented with documentation of each consumer's household her enrollment in Lifeline; and/or
	ibility by relying upon accession to enrolling a consumer in	s to a state database and/or notice of eligibility from the state the Lifeline program.
I am an officer of the compabove.	pany named above. I am auth	orized to make this certification for the Study Area Code listed
Initial CK		

Section 2: Annual Recertification

Do not leave empty blocks. If an ETC has nothing to report in a block, enter a zero.

A	В	С	D	E = (A - B - C - D)
Number of subscribers claimed on February FCC Form 497 of current Form 555 calendar year (February data month)	Number of lines claimed on February FCC Form 497 of current Form 555 calendar year provided to wireline resellers	Number of subscribers claimed on the February FCC Form 497 that were initially enrolled in the current Form 555 calendar year (These subscribers did not have Lifeline service prior to January 1 of the current 555 calendar year.)	Number of subscribers de-enrolled prior to recertification attempt by either the ETC, a state administrator, access to an eligibility database, or by USAC	Number of subscribers ETC is responsible for recertifying for current Form 555 calendar year
5	0	0	0	5

Recertification Results:

F	G	H = (F-G)	I	J = (H+I)
Number of subscribers ETC contacted directly to recertify eligibility through attestation	Number of subscribers responding to ETC contact	Number of non- responding subscribers	Number of subscribers responding that they are no longer eligible (This should be a subset of Block G.)	Number of subscribers de- enrolled or scheduled to be de-enrolled as a result of non-response or response of ineligibility from ETC recertification attempt
5	5	0	0	0

K	L
Number of subscribers whose eligibility was reviewed by state administrator, ETC access to eligibility database, or by USAC	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of finding of ineligibility by state administrator, ETC access to eligibility database, or USAC
0	0

Note: If any subscriber was reviewed by an ETC accessing a state database or by a state administrator and subsequently contacted directly by the ETC in an attempt to recertify eligibility, those subscribers should be listed in Blocks F through J as appropriate and not in Blocks K and L. As a result, all subscribers subject to recertification who were not de-enrolled prior to the recertification attempt must be accounted for in Block F or Block K.

The total of Block F and Block K should equal the number reported in Block E.

Certification:

Based on the data entered above, initial the certification(s) below that apply. Both Certification A and B may apply depending on the recertification procedures in place for the SAC reporting on this form. If Certification C applies, neither Certification A nor B may apply.

A) I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. Results are provided in the chart above in Blocks F through J. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial CK

AND/OR

OR

C) I certify that my company did not claim federal low income support for any Lifeline subscribers for the February Form 497 data month for the current Form 555 calendar year. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

FCC Form 555 November 2014

REDACTED - FOR PUBLIC INSPECTION

Section 3: De-enroll Percentage

Using the data entered in Section 2, complete the chart below to find the percentage of subscribers de-enrolled for this ETC.

$\mathbf{M} = (\mathbf{F} + \mathbf{K})$	N = (J+L)	$O = ((N \div M) * 100)$
Number of subscribers that the ETC attempted to recertify directly or through a state administrator, ETC access to a state database, or by USAC (This should equal the number reported in Block E)	Number of subscribers de-enrolled or scheduled to be de- enrolled as a result of non-response or ineligibility	Percentage of subscribers de-enrolled or scheduled to be de-enrolled as a result of ineligibility or non-response
5	0	0.0%

Section 4: ETCs Subject to the Non-Usage Requirements

All ETCs must complete the appropriate check-box. ETCs that do not assess and collect a monthly fee from their Lifeline subscribers are subject to the non-usage requirements. ETCs subject to the non-usage requirements must indicate the number of subscribers de-enrolled by month in Section 4. ETCs that only assess a fee but do not collect such fees are subject to the non-usage requirements and must also indicate the number of subscribers de-enrolled by month.

Is the ETC subject to the non-usage requirements?

Yes 🔘

No 🗿

If yes, record the number of subscribers de-enrolled for non-usage by month in Block Q below.

P	Q
Month	Subscribers De-Enrolled for Non-Usage
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0
Total Subscribers	0

Signature Block

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area Code (SAC) listed above.

Signed,
Certified Online
Signature of Officer
cking@agoc.com
Email Address of Officer
Carrie Curtis
Person Completing This Certification Form

Christopher S King, Executive VP, Accounting & Finance

Printed Name and Title of Officer
01/25/2017
Date
724-283-0925
Contact Phone Number

Approved by OMB 3060-0819

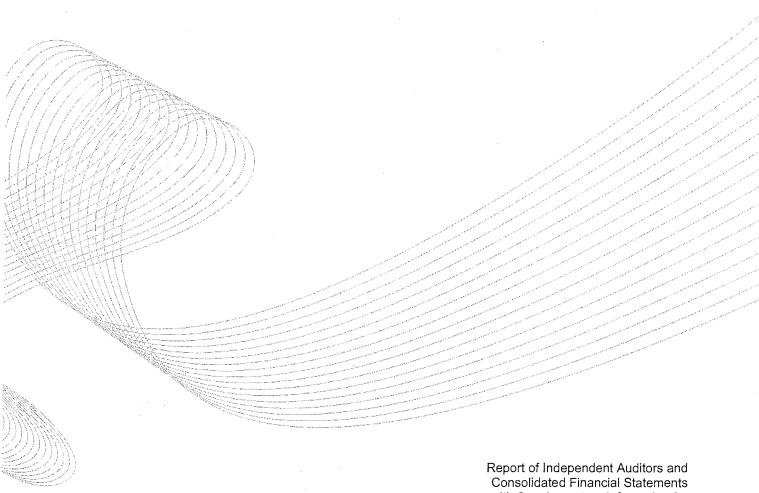
Affiliated ETCs

SAC	Name
200267	Armstrong Telephone Company - Northern Division
170195	Armstrong Telephone Company North
	Armstrong Telephone Company - Maryland
180216	Armstrong Telephone Company - WV
200256	Armstrong Telephone Company - W v Armstrong Telephone Company - New York
150071	Affistrong Telephone Company - New York
	·
·	·
	1

Response to Line3010 Armstrong Telephone Company – Pennsylvania Study Area 170189

Milestone Certification

Pursuant to 47 C.F.R. § 54.202(a) Armstrong Telephone Company – Pennsylvania (the "Company") provides this certification that it is taking reasonable steps to provide upon reasonable request broadband speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to offerings in urban areas as determined in an annual survey as specified in Public Notice DA 17-167, and that requests for such service are met within a reasonable amount of time. Details for how the Company is meetings its obligations for meeting its goals and required obligations are specified within the FCC Form 481 annual filing.



with Supplementary Information for

Armstrong Telephone Company – Pennsylvania, Inc. and Subsidiary

September 30, 2016 and 2015

MOSS-ADAMS LLP

Certified Public Accountants | Business Consultants

Acumen. Agility. Answers.

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REPORT OF INDEPENDENT AUDITORS

Board of Directors Armstrong Telephone Company – Pennsylvania, Inc. and Subsidiary

Report on Financial Statements

We have audited the accompanying consolidated financial statements of Armstrong Telephone Company – Pennsylvania, Inc. and Subsidiary (Company), which comprise the consolidated balance sheets as of September 30, 2016 and 2015, and the related consolidated statements of income, stockholder's equity, and cash flows for the years then ended, and the related notes to the consolidated financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these consolidated financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these consolidated financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audits to obtain reasonable assurance about whether the consolidated financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the consolidated financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the consolidated financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the consolidated financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the consolidated financial statements.



REPORT OF INDEPENDENT AUDITORS (continued)

We believe that the audit evidence obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the consolidated financial statements referred to above present fairly, in all material respects, the consolidated financial position of Armstrong Telephone Company – Pennsylvania, Inc. and Subsidiary as of September 30, 2016 and 2015, and the results of their operations and their cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

MOSS ADAMS LLP

Spokane, Washington January 10, 2017

ARMSTRONG TELEPHONE COMPANY – PENNSYLVANIA, INC. AND SUBSIDIARY CONSOLIDATED BALANCE SHEETS

ASSETS

	Septen	nber 30,
	2016	2015
CURRENT ASSETS		
Cash and cash equivalents	\$	\$
Subscriber accounts receivable, net of allowance		
of \$in 2016 and 2015		
Other accounts receivable, net of allowance	•	
of \$and \$in 2016 and 2015, respectively		
Material and supplies		
Other current assets	<u> </u>	
Total current assets		
•		
NONCURRENT ASSETS		
Other noncurrent assets		
PROPERTY, PLANT, AND EQUIPMENT		
Telecommunications plant in service		
Nonregulated plant in service		
Telecommunications plant under construction		· -
Less accumulated depreciation		
	\$	\$ ()

ARMSTRONG TELEPHONE COMPANY – PENNSYLVANIA, INC. AND SUBSIDIARY CONSOLIDATED BALANCE SHEETS

LIABILITIES AND STOCKHOLDER'S EQUITY

	Septem	ber 30,
	2016	2015
CURRENT LIABILITIES Accounts payable Income tax payable, parent company Other accrued liabilities	\$	
Total current liabilities		
OTHER LIABILITIES AND DEFERRED CREDITS Deferred income taxes		
STOCKHOLDER'S EQUITY Common stock (\$ par value, shares authorized, shares issued and outstanding) Retained earnings		
	\$	\$ ()

ARMSTRONG TELEPHONE COMPANY - PENNSYLVANIA, INC. AND SUBSIDIARY

CONSOLIDATED STATEMENTS OF INCOME

	Years Ended	September 30,
	2016	2015
Operating revenues		
Wireline		
Customer	\$	\$
Intercarrier		
Interstate		
Intrastate		
Universal service support - federal		
Internet		
Miscellaneous		
Equipment		
Carrier billing and collection		
Directory		
Uncollectible and other		
Total operating revenues		
Operating expenses		
Plant specific operations		
Plant nonspecific operations		
Depreciation		
Customer operations		
Corporate operations		
Other operating taxes		
Nonregulated		
Total operating expenses		
Net operating income		
Nonoperating income		
Other nonoperating income		
Income before income taxes		
Income tax expense		
Net income	¢ ====	\$
Mediffeonie	Ψ	Ψ

ARMSTRONG TELEPHONE COMPANY - PENNSYLVANIA, INC. AND SUBSIDIARY CONSOLIDATED STATEMENTS OF STOCKHOLDER'S EQUITY

	Common Stock	Retained Earnings	Total	
Balance, September 30, 2014	\$	\$	\$	
Net income				
Balance, September 30, 2015				
Netincome	- I			
Balance, September 30, 2016	\$	\$	\$ (

ARMSTRONG TELEPHONE COMPANY - PENNSYLVANIA, INC. AND SUBSIDIARY CONSOLIDATED STATEMENTS OF CASH FLOWS

	Years Ended	l September 30,
	2016	2015
CASH FLOWS FROM OPERATING ACTIVITIES Net income Adjustments to reconcile net income to net cash	\$	\$
from operating activities Depreciation Deferred income taxes		
Changes in assets and liabilities Receivables		
Material and supplies Other assets Accounts payable		
Other accrued liabilities		
Net cash from operating activities		
CASH FLOWS FROM INVESTING ACTIVITIES Net acquisition of property, plant, and equipment		
NET CHANGE IN CASH AND CASH EQUIVALENTS		
CASH AND CASH EQUIVALENTS, beginning of year	<u> </u>	
CASH AND CASH EQUIVALENTS, end of year	\$	\$
SUPPLEMENTAL DISCLOSURE OF CASH FLOWS INFORMATION Cash paid during the year for		
Income taxes	\$	\$

ARMSTRONG TELEPHONE COMPANY - PENNSYLVANIA, INC. AND SUBSIDIARY NOTES TO CONSOLIDATED FINANCIAL STATEMENTS

Note 1 - Significant Accounting Policies

Description of entity – Armstrong Telephone Company – Pennsylvania, Inc. (Company) is an incumbent local exchange carrier that provides telephone and other related telecommunications services, Internet, inside wire, and customer premise equipment in the state of Pennsylvania. The Company is wholly owned by Armstrong Holdings, Inc. (AHI).

The Company owns % of the outstanding common stock of Armstrong Telephone Company – North, Inc. (North), which provides similar services in the state of Pennsylvania.

Principles of consolidation - The financial statements include the accounts of its wholly owned subsidiary and comparative consolidated financial statements of the Company for the years ended September 30, 2016 and 2015. All significant intercompany transactions and balances have been eliminated in consolidation.

Accounting policies – The financial statements of the Company have been prepared in conformity with accounting principles generally accepted in the United States of America applicable to regulated public utilities. Such accounting principles are consistent, in all material respects, with accounting prescribed by the Federal Communications Commission (FCC).

Accounting estimates – The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenue and expenses during the reporting period. Significant estimates include depreciation expense and interstate access revenues. Actual results could differ from those estimates.

Cash and cash equivalents – For purposes of the statement of cash flows, the Company considers all highly liquid investments with original maturities of three months or less to be cash equivalents.

Concentration of risk – The Company's cash is held by several banking institutions. At various times throughout the year, cash balances exceeded federally insured limits of \$\frac{4}{2}\frac{1}{2}

In 2016 and 2015, the Company received \$ or \$\text{w} or \$\text{w} \text{\text{and \$ \$\text{solution} }} \text{\text{\text{or } \$\text{w} \text{\text{or } \$\text{or } \$\text{w} \text{\text{or } \$\text{w} \text{\text{or } \$\text{or } \$\text{w} \text{\text{or } \$\text{or } \$\text{w} \text{\text{or } \$\text{or } \$

ARMSTRONG TELEPHONE COMPANY - PENNSYLVANIA, INC. AND SUBSIDIARY NOTES TO CONSOLIDATED FINANCIAL STATEMENTS

Note 1 - Significant Accounting Policies (continued)

Accounts receivable – Accounts receivable are stated at the amount management expects to collect on outstanding balances. The Company reviews the collectibility of accounts receivable annually based upon an analysis of outstanding receivables, historical collection information, and existing economic conditions. Receivables from subscribers are due 30 days after issuance of the subscriber bill. Receivables from other exchange carriers are typically outstanding from 30 to 60 days before payment is received. Management provides for probable uncollectible amounts through a charge to earnings and a credit to a valuation allowance based on its assessment of the current status of individual accounts. Balances still outstanding after management has used reasonable collection efforts are written off through a charge to the valuation allowance and a credit to accounts receivable.

Material and supplies - Material and supplies are valued at the lower of cost or market determined by specific identification.

Property, plant, and equipment – Property, plant, and equipment are stated at original cost. Regulated plant includes assets that are jointly used for regulated and nonregulated activities. The cost of additions and substantial betterments of property, plant, and equipment is capitalized. The cost of maintenance and repairs is charged to operating expenses.

In accordance with composite group depreciation methodology, when a portion of Company's regulated depreciable property, plant, and equipment is retired in the ordinary course of business, the gross book value is charged to accumulated depreciation.

Depreciation of Company's nonregulated plant is provided by the straight-line method over the estimated useful lives of the assets. Upon retirement, sale, or other disposition of nonregulated investments, the cost and related accumulated depreciation are removed from the related accounts and the resulting gains or losses are included in operations.

Income taxes – The Company is a member of a group that files a consolidated federal tax return. Accordingly, income taxes payable to (refundable from) the tax authority are recognized on the financial statements of the parent company who is the taxpayer for federal income tax purposes. The members of the consolidated group allocate payments to any member of the group for the income tax reduction resulting from the member's inclusion in the consolidated return, or the member makes payments to the parent company for its allocated share of the federal consolidated income tax liability. This allocation approximates the amounts that would be reported if the Company were separately filing its tax returns. The result of these allocations is reported on the accompanying balance sheets under the caption "Income tax receivable, parent company" or "Income tax payable, parent company." The parent company files consolidated tax returns with tax authorities based on a fiscal year ending September 30. The Company files a separate return for state tax purposes. Income taxes payable to (refundable from) the state are recognized on the Company's financial statements.

ARMSTRONG TELEPHONE COMPANY - PENNSYLVANIA, INC. AND SUBSIDIARY NOTES TO CONSOLIDATED FINANCIAL STATEMENTS

Note 1 - Significant Accounting Policies (continued)

Income taxes (continued) – Deferred taxes are provided on a liability method whereby deferred tax assets are recognized for taxable temporary differences and net operating losses and deferred tax liabilities are recognized for deductible temporary differences. Temporary differences are the differences between the reported amounts of assets and liabilities and their tax bases. Deferred tax assets are reduced by a valuation allowance when, in the opinion of management, it is more likely than not that some portion or all of the deferred tax will not be realized. Deferred tax assets and liabilities are adjusted for the effects of changes in tax laws and rates on the date of enactment.

The Company records uncertain tax positions if the likelihood the position will be sustained upon examination is less than . As of September 30, 2016 and 2015, the Company had no accrued amounts related to uncertain tax positions. Interest and penalties, if any, are recorded as interest expense and other expense, respectively.

Revenue recognition – Monthly service fees derived from local wireline and Internet are billed one month in advance, but recognized in the month that service is provided.

Usage sensitive revenues such as access (revenues earned for originating/terminating long distance calls) and long distance are generally billed as a per-minute charge. Although these revenues are billed in arrears, an estimate of unbilled revenues is accrued in the month service is provided.

Interstate access revenues are included in settlements based on the Company's participation in the revenue pools administered by the National Exchange Carrier Association (NECA). Settlement revenues at the Company are determined by annually prepared separations and interstate access cost studies. These studies are prepared subsequent to year end and, therefore, the related revenues are recorded on the books based on an estimate of NECA pool earnings and on other assumptions related to information utilized in the preparation of the Company's cost study. The studies are subject to a 24-month pool earnings adjustment period and a review of the study by NECA. There was an insignificant revenue impact on 2016 and 2015 for adjustments related to prior year differences between the recorded estimates and actual revenues. Furthermore, management does not anticipate that 2016 and 2015 recorded revenues will require significant adjustments in future years.

North's revenues for interstate access services are determined by formulas that are based upon a representative sample of pooled network facility costs and demand quantities (i.e. minutes of use, access lines, etc.). These formulas are approved by the FCC annually and the pools are subject to a 24-month adjustment period. Management does not anticipate significant adjustments to recorded revenues for the years ended September 30, 2016 and 2015.

ARMSTRONG TELEPHONE COMPANY - PENNSYLVANIA, INC. AND SUBSIDIARY NOTES TO CONSOLIDATED FINANCIAL STATEMENTS

Note 1 - Significant Accounting Policies (continued)

Revenue recognition (continued) - Access revenues are classified in wireline revenues above as follows:

- Customer revenues include end user charges such as Subscriber Line Charge (SLC), Federal Universal Service Charge (FUSC), Access Recovery Charge (ARC), and special access billed to end users.
- Universal Service Support includes the amounts received from the Universal Service Fund for High Cost Loop Support (HCLS), Interstate Common Line Support (ICLS), and Connect America Fund (CAF) support.
- All access charge and settlement revenue except as described above is classified as intercarrier revenue.

Internet revenues are derived from the provision of customer access to the public Internet, excluding revenues attributable to DSL transport (line costs between the customer and the Company's equipment that routes Internet traffic). Interstate access revenues include settlements from NECA that compensate the Company for the DSL transport related to the provision of Internet services.

Wireline universal service support revenue is intended to compensate the Company for the high cost of providing rural telecommunications service. Universal service support revenue includes funds received for HCLS, ICLS, CAF support, and other miscellaneous programs. HCLS and ICLS are based on the Company's relative level of operating expense and plant investment. Support from CAF is based on a historical frozen amount related to 2011 investment and expenses associated with the switching function and certain 2011 intrastate access revenues, which together make up the CAF base. The CAF base will be reduced by each year in determining CAF support.

Regulation - The Company's services are subject to rate regulation as follows:

- Local telephone and intrastate access revenues are regulated by the state public utility commissions. The FCC also has assumed preemptive authority to regulate intrastate telecommunications services, including intrastate access rates.
- Interstate access revenues are regulated by the FCC through its regulation of rates and settlements procedures as administered by NECA.
- Universal service revenues are administered by Universal Service Administrative Company (USAC), based on rules established by the FCC.

ARMSTRONG TELEPHONE COMPANY - PENNSYLVANIA, INC. AND SUBSIDIARY NOTES TO CONSOLIDATED FINANCIAL STATEMENTS

Note 1 - Significant Accounting Policies (continued)

Regulation (continued) – The FCC released an Order and Further Notice of Proposed Rulemaking (FNPRM) in 2016, that reforms the High Cost Program supporting rate-of-return carriers. The following changes have been implemented to modernize the program:

- Provides support for stand-alone broadband services and investment;
- Requires broadband deployment based on the number of locations lacking service and the cost of providing service;
- Requires allowances for capital investments and limits on operational expenses; and
- Phases out support for areas served by a qualifying competitor.

The FNPRM also created two paths to receive high cost support for rate of return carriers. The model-based option is voluntary and is a fixed amount of support for ten years. The legacy mechanism reforms the existing ICLS mechanism to support stand-alone broadband and will now be known as the Connect America Fund Broadband Loop Support (CAF BLS).

Effective November 1, 2016, the Company made an election to remain on the reformed legacy mechanism as described above.

Other sources of revenues are not rate regulated, and include Internet, long distance, equipment sales, billing and collection, and other incidental services.

Nonregulated expenses and nonregulated plant are directly attributable to the following nonregulated services: Internet and miscellaneous revenues.

All other operating expenses and telecommunications plant are related primarily to wireline revenues. However, some of these costs jointly relate to regulated and nonregulated services. For interstate access settlement, universal service support, rate case, and other regulatory purposes, the portion of these common costs related to nonregulated activities are removed in accordance with Part 64 of the FCC rules in order to ensure regulated revenues are based on costs of providing regulated services.

Advertising expenses – The Company expenses advertising costs as incurred. Advertising expenses during the years ended September 30, 2016 and 2015, were and and respectively.

Allowance for funds used during construction (AFUDC) – The Company records as income and capitalizes as a cost of construction the cost of financing large construction projects spanning a period greater than two months. The Company uses a weighted-average interest rate based on total long-term debt. No amounts were capitalized for the years ended September 30, 2016 or 2015.

ARMSTRONG TELEPHONE COMPANY - PENNSYLVANIA, INC. AND SUBSIDIARY

NOTES TO CONSOLIDATED FINANCIAL STATEMENTS

Note 1 - Summary of Significant Accounting Policies (continued)

Subsequent events – Subsequent events are events or transactions that occur after the balance sheet date but before the financial statements are available to be issued. The Company recognizes in the financial statements the effects of all subsequent events that provide additional evidence about conditions that existed at the date of the balance sheet, including the estimates inherent in the process of preparing financial statements. The Company's financial statements do not recognize subsequent events that provide evidence about conditions that did not exist at the date of the balance sheet but arose after the balance sheet date and before the financial statements are available to be issued.

The Company has evaluated subsequent events through January 10, 2017, which is the date the financial statements are available to be issued.

Reclassifications – For comparability, certain of the 2015 figures have been reclassified in order to conform to the 2016 presentation. These reclassifications had no effect on net income as previously reported.

Note 2 - Property, Plant, and Equipment

Telecommunications plant balances, together with accumulated depreciation balances, consist of the following at September 30:

	Depreciation Rate	Plant Account	Accumulated Depreciation	2016 Net Balance	2015 Net Balance
Regulated General support assets Central office assets Cable and wire facilities Plant under construction	5 - 20 years 8 - 12 years 10 - 30 years n/a	\$	\$	* =	\$
Nonregulated Internet CPE Other	5 years 5 years 5 years	-		-	
		\$ ()	\$ ()	\$ ()	\$

ARMSTRONG TELEPHONE COMPANY - PENNSYLVANIA, INC. AND SUBSIDIARY NOTES TO CONSOLIDATED FINANCIAL STATEMENTS

Note 3 - Income Taxes

The components of the provision for income tax benefit (expense) are:

	Years Ende	d September 30,
	2016	2015
Current		
Federal	\$	\$
State		
Deferred	<u> </u>	
Federal		
State		
	<u></u>	
	\$ (\$ (

The provision for income taxes differs from the amount computed by applying the current statutory federal income tax rate to earnings before taxes due to the effects of state taxes (net of federal benefit), nondeductible items, nontaxable items, and prior year over or under accruals.

The components of the net deferred tax (assets) and liabilities recorded in the accompanying balance sheets are:

		September	
	2016	<u> </u>	2015
Deferred tax assets Accrued employee benefits Allowance for doubtful accounts	\$	5 \$	
Total deferred tax assets			
Deferred tax liabilities Tax amortization and depreciation greater than book Prepaid expenses deducted for tax Regulatory liability			7
Total deferred tax liabilities			
Net deferred tax liabilities	\$	\$	
The Company has income taxes payable to the parent company September 30, 2016 and 2015, respectively.	y of \$	and \$	as of

ARMSTRONG TELEPHONE COMPANY - PENNSYLVANIA, INC. AND SUBSIDIARY

NOTES TO CONSOLIDATED FINANCIAL STATEMENTS

Note 4 - Pension Plan

Armstrong Utilities, Inc. (AUI), an affiliate, has a noncontributory defined contribution retirement plan (Plan), which covers certain affiliates and substantially all employees of the Company. AUI and certain affiliates, including the Company, contribute % of the annual base earnings of all participants to the Plan. Pension costs for the Company for the years ended September 30, 2016 and 2015, were and and respectively.

Note 5 - Related Party Transactions

The Company is an affiliate of The Armstrong Group of Companies and participated in various related party transactions listed below.

The Company received data processing, billing, and other support services from Judco Management, Inc. (Judco) in the amounts of and and for the years ended September 30, 2016 and 2015, respectively. Additionally, the Company paid Judco for office rents for both years ended September 30, 2016 and 2015. The Company also paid Judco for use of the corporate airplane for both years ended September 30, 2016 and 2015.

The Company also received management and other administrative services from Judco in the amounts of and and for the years ended September 30, 2016 and 2015, respectively.

The Company received engineering and network support services from AUI in the amounts of and for the years ended September 30, 2016 and 2015, respectively. Additionally, the Company paid AUI for accounting, marketing, and operations support services for the years ended September 30, 2016 and 2015, respectively.

North also received construction services from Armstrong Telephone Company - New York, Inc. in the amounts of \$ and \$ and \$ for the years ended September 30, 2016 and 2015, respectively.

As of September 30, 2016 and 2015, included in other accounts receivable, the Company had accounts receivable from affiliates of and the respectively, and included in accounts payable, the Company had accounts payable to affiliates of and the respectively.

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REPORT OF INDEPENDENT AUDITORS ON SUPPLEMENTARY INFORMATION

Board of Directors Armstrong Telephone – Pennsylvania, Inc. and Subsidiary

We have audited the consolidated financial statements of Armstrong Telephone Company – Pennsylvania, Inc. and Subsidiary, as of and for the years ended September 31, 2016 and 2015, and have issued our report dated January 6, 2017, which contained an unqualified opinion on those consolidated financial statements. Our audit was conducted for the purpose of forming an opinion on the consolidated financial statements as a whole. The consolidating balance sheet detail and consolidating statement of income detail is presented for purposes of additional analysis and is not a required part of the consolidated financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the consolidated financial statements. The information has been subjected to the auditing procedures applied in the audit of the consolidated financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the consolidated financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America.

In our opinion, the supplementary financial information is fairly stated, in all material respects, in relation to the basic consolidated financial statements taken as a whole.

Mass ADAMS LEP

Spokane, Washington January 10, 2017



ARMSTRONG TELEPHONE COMPANY – PENNSYLVANIA, INC. AND SUBSIDIARY CONSOLIDATING BALANCE SHEET DETAIL

	September 30, 2016				
			Consolidating	Consolidated	
	Pennsylvania	North	Entries	Total	
~					
CURRENT ASSETS					
Cash and cash equivalents	\$	\$	\$ -	\$	
Subscriber accounts receivable			-		
Other accounts receivable					
Income taxes receivable, parent company					
Material and supplies			-		
Other current assets					
Total current assets					
NONCURRENT ASSETS					
Investment in affiliated companies		-		_	
Deferred income taxes				_	
Other noncurrent assets	· <u>-</u>				
other noneutrent assets					
Total noncurrent assets					
PROPERTY, PLANT, AND EQUIPMENT					
Telecommunications plant in service			• -		
Nonregulated plant in service			-		
Telecommunications plant under construction			-		
•					
			-		
Less accumulated depreciation					
			-		
			.	·	
•	\$	\$	\$	\$ 1	

ARMSTRONG TELEPHONE COMPANY – PENNSYLVANIA, INC. AND SUBSIDIARY CONSOLIDATING BALANCE SHEET DETAIL

	September 30, 2016								
	Pennsylvania		North		Consolidating Entries		Consolidated Total		
CURRENT LIABILITIES Accounts payable Income taxes payable, parent company Other accrued liabilities	\$		\$	3	\$	<u> </u>	\$	3	
Total current liabilities					0,				
DEFERRED INCOME TAXES				-					
STOCKHOLDER'S EQUITY Common stock Additional paid-in capital Retained earnings									
	\$		\$		\$		\$		

ARMSTRONG TELEPHONE COMPANY – PENNSYLVANIA, INC. AND SUBSIDIARY CONSOLIDATING STATEMENT OF INCOME DETAIL

	Year Ended September 30, 2016						
	Pennsylvania		North	Consolidating Entries		Consolidated Total	
OPERATING REVENUES							
Wireline Customer	\$	\$		\$	_	\$	
Intercarrier	Φ	ψ		Ψ	_	Ψ	
Interstate					**		
Intrastate Universal service support - federal			23		-	1	
omversarios victorapporo reaerar					_		
Internet						·····	
Miscellaneous							
Equipment					-		
Carrier billing and collection Directory					-		
Uncollectible and other							
Total operating revenue							
OPERATING EXPENSES							
Plant specific operations					-		
Plant nonspecific operations Depreciation					. -		
Customer operations					-	_	
Corporate operations			72		-		
Other operating taxes Nonregulated					-		44
				-	_	(
Net operating income							
OTHER INCOME (EXPENSE) Other nonoperating income							
Income before income taxes							
Income tax expense				A	<u>.</u>		
Net income	\$	\$		\$		\$	